Public Comment on Transgenic Trees

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I am Michael Fernandez, Director of Science for the Pew Initiative on Food and Biotechnology, a nonprofit, nonpartisan research project committed to informing the public and policymakers on issues about genetically modified food and agricultural biotechnology. We do not advocate for, or against, the application of biotechnology to agriculture. Instead, we try to provide unbiased information about genetic engineering and to encourage constructive public dialogue on issues surrounding the use of biotechnology in agriculture.

As part of that mission, the Initiative cosponsored a public conference in December of 2001 to provide a platform where the broad range of views and perspectives surrounding the potential introduction of genetically engineered trees into forest ecosystems could be expressed and shared in a public manner. The event was cosponsored with the Society of American Foresters and the Ecological Society of America. Attendees included scientists, foresters, technology providers, non-governmental organizations and government agencies.

Over a two-day period, speakers addressed the potential benefits and risks of the technology; the cultural, social and historical framework in which decisions about the application of biotechnology in forestry will take place; economic considerations that may shape the development and adoption of the technology; and the domestic and international regulatory regimes that govern the possible use of the technology.

My comments today are derived from the proceedings of that conference, which are available on the Pew Initiative website at www.pewagbiotech.org. Individual presentations of each of the speakers are also available on the site.

Several key points emerged from our discussions:

- First, scientific uncertainties and the relative lack of baseline information about complex forest ecosystems may pose challenges to the existing methods of analyzing risks and benefits.
- Second, genetic engineering technology holds promise for the forestry and forestry products industries as well as for environmental conservation. The potential

environmental impacts of genetically engineered trees must be weighed against the costs of not pursuing the technology.

- Third, developers of genetically engineered trees could avoid some of the controversy associated with transgenic crops if the first products that reach the market are shown to have clear value to the end consumer, rather than chiefly benefiting technology providers and growers.
- Lastly, many who attended our conference believed that transparency in the
 regulatory process and opportunities for public input into decisions over
 biotechnology applications are essential to public confidence. This notion was
 reinforced by the fact that genetically engineered trees are primarily being considered
 for use on private lands -- where the decision-making process is not as open to broad
 public input as are decisions governing use of public lands.

This last point is particularly relevant to this public meeting, and I applaud the Department of Agriculture for convening this meeting as one way to make scientific information publicly available and to solicit public input into the risk assessment process. This is an important forum and a key step in the process of enhancing the public debate. However, there are other issues relevant to the introduction of GE trees that do not appropriately fall within the risk assessment process. For instance, the social values associated with trees and forests are a crucial component of the public debate, and we need to continue to find platforms where these kinds of issues can be vetted in an open public dialogue with all interested parties.

Going forward, the Pew Initiative will continue to promote open discussion of the range of issues involved in the application of genetic engineering to all forms of agriculture including crops, animals and trees. We hope that USDA and other regulatory agencies involved in making decisions about transgenic products will work to share information about these products in an open and straightforward manner. Such a commitment to transparency and public participation is the best way to ensure that society balances the unique risks and benefits associated with the products of agricultural biotechnology.